

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JASON WALTERS,

Plaintiff,

v.

EXCEL, INC. d/b/a DHL SUPPLY CHAIN,

Defendant.

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CIVIL ACTION NO. 3:22-cv-01840-C

DEFENDANT’S EXPERT WITNESS DESIGNATION

Pursuant to FED. R. CIV. P. 26(a)(2), Defendant Exel Inc. (“**Defendant**”) submits this expert witness disclosure and designate the following individual(s):

- (1) David Steinfield
Steinfeld Search
10440 N. Central Expressway, Suite 800
Dallas, Texas 75231

Mr. Steinfield’s written report, pursuant to Fed. R. Civ. P. 26(a)(2), is attached hereto as Exhibit 1.

- (2) Annie Lau
FISHER & PHILLIPS LLP
500 North Akard Street, Suite 3550
Dallas, TX 75201
(214) 220-9100

Ms. Lau is lead counsel of record for Defendant in this lawsuit and will provide expert testimony, if needed, on the issue of reasonable and necessary attorneys’ fees and costs incurred by Plaintiff herein. Ms. Lau may also provide expert testimony as to reasonable attorneys’ fees and costs that Defendant may seek to recover herein. Defendant is not required to produce a written report under RULE 26(a)(2)(B) because Ms. Lau is not retained or specially employed to provide expert witness testimony in this arbitration, nor is she an employee of Defendant who is regularly

involved in giving expert testimony. Defendant anticipates that Ms. Lau will provide testimony on issues that include (but are not limited to) those related to attorney and paralegal billing rates, fees, and costs sought in this arbitration based on her more than 14 years of experience as a licensed attorney; and her understanding of the customary hourly rates charged in the relevant legal market. Such testimony will depend on the expert testimony and opinions presented by any expert offered by Plaintiff in regard to attorneys' fees. See <https://www.fisherphillips.com/en/people/annie-lau.html> for Ms. Lau's professional biography.

Defendant reserves the right to amend or supplement this designation or to designate additional experts as may become apparent or necessary through continued discovery or consolidation or joinder of new claims. Defendant also reserves the right to elicit, by way of cross-examination, opinion testimony from experts designated and called by Plaintiff. Defendant reserves the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at the hearing, and to re-designate same as a consulting expert who cannot be called by opposing counsel.

Respectfully Submitted,

/s/ Theanna Bezney
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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2023, I filed the foregoing document with the Court's electronic case filing system, which shall send notice of the foregoing filing to all counsel of record, as follows:

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/s/ Theanna Bezney

Theanna Bezney